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10 Attorney for Plaintiff/Counterclaim Defendant
11 **GREEN TREE SERVICING LLC, now**
12 **known as Ditech Financial LLC**

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 GREEN TREE SERVICING LLC,

CASE NO. 2:15-cv-00537-JAD-PAL

16 Plaintiff,

17 v.

18 LAS VEGAS RENTAL & REPAIR LLC SERIES
19 73; MONACO LANDSCAPE MAINTENANCE
20 ASSOCIATION,

**STIPULATION AND ORDER TO
DISMISS MONETARY CLAIMS
AGAINST DITECH**

21 Defendants.

22 LAS VEGAS RENTAL & REPAIR LLC SERIES
23 73, a Nevada Limited Liability Company,

24 Counterclaim Plaintiff,

25 v.

26 GREEN TREE SERVICING LLC; DOE
27 INDIVIDUALS 1 through 10, inclusive; ROE
28 CORPORATIONS 1 through 10, inclusive,

Counterclaim Defendants.

29 LAS VEGAS RENTAL & REPAIR LLC
30 SERIES 73, a Nevada Limited Liability
31 Company,

32 Third Party Plaintiff,

33 v.

34 ANAMARIE I. DUMITRESCU, an individual;
35 DOE INDIVIDUALS 1 through 10, inclusive; ROE
36 CORPORATIONS 1 through 10, inclusive,

37 Third Party Defendants.

STIPULATION

Ditech Financial LLP (“Ditech”) and Las Vegas Rental & Repair LLC Series 73 (“LVRR”) by and through their undersigned counsel of record hereby stipulate as follows:

1. On February 11, 2019 , Ditech filed a Bankruptcy with the United States Bankruptcy Court for the Southern District of New York.

2. On September 26, 2019, the Bankruptcy Court entered the Order Confirming Third Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors (ECF No. 1404) (the “Confirmation Order”) approving the terms of the Third Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors (ECF No. 1326) (the “Plan”). The Plan incorporates the sale of Ditech’s reverse and forward businesses to separate buyers (the “Buyers”).

3. The Plan contains a permanent injunction (the “Injunction”) that specifically prohibits parties from, among other things, taking actions inconsistent with the Plan, including, as relevant here, forever prosecuting any action against Ditech for monetary recovery on account of any claim arising prior to the closing of the transactions under the Plan—September 30, 2019.

4. Given the foregoing, LVRR and Ditech hereby stipulate and agree to voluntarily dismiss with prejudice all claims against Ditech in this action for monetary damages or other monetary relief, including costs and attorney's fees.

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1 5. All other claims and defenses regarding title to the property and the effect of the
2 HOA foreclosure sale remain in dispute.

3 **IT IS SO STIPULATED.**

5 DATED: January 28, 2020

6 WOLFE & WYMAN LLP

8 By: /s/Colt B. Dodrill
9 COLT B. DODRILL, ESQ.
Nevada Bar No. 9000
cbdodrill@ww.law
10 6757 Spencer St.
Las Vegas, NV 89119
11 Plaintiff/Counterclaim Defendant
GREEN TREE SERVICING LLC, now
known as Ditech Financial LLC

DATED: _____, 2020

CLARK NEWBERRY LAW FIRM

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12 Attorneys for Defendant/Counterclaimant
LAS VEGAS RENTAL & REPAIR LLC
SERIES 73

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16
17 **ORDER**

18 **IT IS SO ORDERED.**

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UNITED STATES DISTRICT JUDGE
January 30, 2020.